

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	Case No. 04-CR-10298-DPW
)	
v.)	
)	
MARKO BOSKIC)	
_____)	

DEFENDANT MARKO BOSKIC'S MOTION IN LIMINE
TO PRECLUDE USE OF THE TERM
"ETHNIC CLEANSING"

Defendant Marko Boskic hereby moves for an order precluding the government and its witnesses from using the term "ethnic cleansing" during the trial of the case. Use of the term will evoke a highly emotional response from jurors and is likely to prejudice jurors against defendant. Because the government has no evidence that defendant believed in or was motivated by "ethnic cleansing," the term should not be used.

Respectfully submitted,

/s/ Patricia Garin
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Dated: June 12, 2006

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